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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF DEFENDANTS UBER
TECHNOLOGIES, INC.'S AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBITS TO THEIR
MOTION TO COMPEL PRODUCTION
OF DOCUMENTS (DKT. 867)**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants’ Administrative Motion to File Under
7 Seal Exhibits to Their Motion To Compel Production of Documents (Dkt. 867) (the “Administrative
8 Motion”). The Administrative Motion seeks an order sealing highlighted portions of Exhibit 1.

9 3. The green highlighted portions of Exhibit 1 contain or reference trade secret and
10 confidential business information, which Waymo seeks to seal.

11 4. The green highlighted portions of Exhibit 1 contain, reference, and/or describe
12 Waymo’s asserted trade secrets. The information Waymo seeks to seal includes the confidential
13 design and functionality of Waymo’s proprietary autonomous vehicle system, which Waymo
14 maintains as secret. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-
15 47) and are valuable as trade secrets to Waymo’s business (Dkt. 25-31). The public disclosure of this
16 information would give Waymo’s competitors access to descriptions of the functionality or features of
17 Waymo’s autonomous vehicle system. If such information were made public, I understand that
18 Waymo’s competitive standing would be significantly harmed.

19 5. Waymo’s request to seal is narrowly tailored to those portions of Exhibit 1 that merit
20 sealing.

21
22 I declare under penalty of perjury under the laws of the State of California and the United
23 States of America that the foregoing is true and correct, and that this declaration was executed in San
24 Francisco, California, on July 17, 2017.

25 By /s/ Lindsay Cooper
26 Lindsay Cooper
27 Attorneys for WAYMO LLC
28

ATTESTATION

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from Lindsay Cooper.

By: /s/ Charles K. Verhoeven
Charles K. Verhoeven